

# DOCKET SECTION

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, DC 20268-0001

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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

Docket No. R97-1

Postal Rate And Fee Changes, 1997

**INTERROGATORIES OF  
ALLIANCE OF NONPROFIT MAILERS  
TO UNITED STATES POSTAL SERVICE  
(ANM/USPS-1-16)  
November 3, 1997**

The Alliance of Nonprofit Mailers hereby submits the following interrogatories and requests for production of documents:<sup>1</sup>

ANM/USPS-1. For each Library Reference that the Postal Service has sponsored into evidence, or expects to sponsor into evidence, please:

- (a) provide a detailed description of the methods used in collecting and summarizing the data included in or relied upon by the Library Reference,
- (b) identify each person who collected or summarized the data, and
- (c) state when and where the data were collected and summarized.

ANM/USPS-2. For each Library Reference that the Postal Service has sponsored into evidence, or expects to sponsor into evidence, please produce summaries of sample data, allocation factors, and other data contained in or relied upon in the Library Reference.

ANM/USPS-3. For each Library Reference that the Postal Service has sponsored into evidence, or expects to sponsor into evidence, please:

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<sup>1</sup> If you cite to a publicly available document in lieu of producing an item of requested information, provide citations to specific pages, lines, columns or cells, respectively, if the document contains multiple pages, lines, columns or cells.

- (a) provide, where applicable, a description of the expansion ratio(s) used in each such Library Reference,
- (b) describe (i) the method(s) employed to expand the data, (ii) the reason(s) for expanding the data, (iii) when and where the data were expanded, and (iv) the identities of the persons who expanded the data.

ANM/USPS-4. For each Library Reference that the Postal Service has sponsored into evidence, or expects to sponsor into evidence, please:

- (a) identify each special study used to modify, expand, project, or audit routinely collected data used in or relied upon by the Library Reference (for this question, a “special study” includes any deliberate action taken to modify, expand, project, or audit routinely collected data),
- (b) state the goals and objectives of each such special study,
- (c) identify the person(s) who proposed and person(s) who authorized each such special study,
- (d) identify each person consulted about the feasibility and desirability of undertaking each such special study,
- (e) state the date on which (i) the decision to undertake the special study was made, (ii) the date on which each such special study was completed, and (iii) the date(s) on which the final and any preliminary or interim report(s) was (were) submitted,
- (f) produce the results (whether preliminary, interim or final) of the special study, and
- (g) identify the person(s) to whom reports or results of the study (whether preliminary, interim or final) were sent.

ANM/USPS-5. For each Library Reference that the Postal Service has sponsored into evidence, or expects to sponsor into evidence, state whether the Library Reference involves, includes, or relies upon:

- (a) one or more statistical studies,
- (b) one or more computer analyses,

- (c) one or more computer simulation models, or
- (d) one or more studies or analyses that do not fit in categories (a) through (c).

For each responsive study or analysis, identify the corresponding Library Reference(s) and state in which group(s) (a) through (d) the study or analysis belongs.

ANM/USPS-6. For each and every study or analysis identified in response to ANM/USPS-5 above, please:

- (a) set forth clearly and completely (i) the study plan for each study or analyses and (ii) all relevant assumptions related to each such study or analysis, or
- (b) state where a clear and complete statement of the study plan and all relevant assumptions can be found.

ANM/USPS-7. For each and every study or analysis identified in response to ANM/USPS-5 above, please (a) provide a description of the techniques of data collection, estimation and/or testing, or (b) state where a clear description of the techniques of data collection, estimation and/or testing may be found.

ANM/USPS-8. For each study or analysis identified in response to ANM/USPS-5 above, please identify:

- (a) the person(s) who originally proposed the study or analysis,
- (b) the date(s) on which each study or analysis was proposed and approved,
- (c) the person(s) who approve or authorized the each study or analyses,
- (d) the person(s) who was (or were) primarily responsible for conducting each study or analysis,
- (e) the person(s) who prepared and submitted the results of each such study or analysis,
- (f) the date on which the study or analysis was completed,
- (g) the date the report or conclusions were reported, and the person(s) to whom they were reported, and

- (h) each person to whom, and date(s) on which, any interim or preliminary results or reports were submitted.

ANM/USPS-9. For each and every study or analysis identified in response to ANM/USPS-5 above, please provide copies of (a) all forms used to collect, record, summarize or report data or results, and (b) all instructions and training materials provided to persons actually engaged in collecting, processing, summarizing or reporting any data used in any study or analysis

ANM/USPS-10. For each and every study or analysis identified in response to ANM/USPS-5 above, please state clearly the facts and judgments upon which conclusions are based.

ANM/USPS-11. For each and every study or analysis identified in response to ANM/USPS-5 above, please describe clearly and in detail, the alternative courses of action that were considered.

ANM/USPS-12. For all statistical studies identified in response to ANM/USPS-5 above, please provide a comprehensive description of:

- (a) the procedures undertaken, including those employed in the collection of all data used,
- (b) the formula used for statistical estimates,
- (c) the standard errors for each component estimated,
- (d) the test statistics and a description thereof as well as all related computations and final results for each such statistical study, and
- (e) the source of all data or information used in each such study by document, page, line, column, etc.

ANM/USPS-13. For each and every study identified pursuant to ANM/USPS-5 above, which involves, includes, or relies upon sample surveys, please provide or identify by document, page, line and or column, where one can find:

- (a) a clear description of (i) the survey design, including the definition of the universe studied, (ii) the sampling frame and units, and (iii) the validity and confidence limits placed on the major estimates,
- (b) an explanation of the method of selecting the sample, and
- (c) a description of the characteristics measured or counted.

ANM/USPS-14. For each and every study identified pursuant to question ANM/USPS-5 above which involves, includes, or relies upon econometric studies, please provide

- (a) a presentation of the economic theory underlying the study,
- (b) a complete description of the econometric model(s) and the reasons for each major assumption and specification,
- (c) the definition of the variables selected and the justification for their selection,
- (d) a statement of the reasons for rejecting any alternative model whose computed econometric results influenced the choice of the preferred model,
- (e) an identification of any differences between the rejected alternative and the preferred model,
- (f) a detailed description in a text, manual, or technical journal for every econometric technique used in the estimation process, and the reasons for selecting the technique or a description and analysis of the technique that is sufficient for a technical evaluation,
- (g) a summary description of and source citations for all input data and a complete listing of all data,
- (h) a complete description of any alterations or transformations made to the data as received from the original sources and the reasons for all alterations or transformations,
- (i) a complete report of the econometric results including, where applicable: (1) coefficient estimates, (2) standard errors and t-values, (3) goodness-of-fit statistics, (4) other appropriate test statistics, (5) the variance /covariance matrix of the estimates, (6) computed residuals of results computed from samples

composed of fewer than 250 observations and (7) all statistical tests of hypotheses and the results of such tests.

ANM/USPS-15. For all computer analyses identified pursuant to question ANM/USPS-5 above, please provide:

- (a) a general description of the program,
- (b) the processing tasks performed,
- (c) the methods and procedures employed,
- (d) a listing of the input and output data together with designations of all sources of such data, including citations to the document from which the data were taken (and citations to specific pages, lines, columns and cells in multi-page, multi-line, multi-column and multi-cell documents, respectively),
- (e) documentation sufficiently comprehensive and detailed to satisfy generally accepted software documentation standards appropriate to the type of programming and to its intended use,
- (f) an explanation of each modification to such data made for use in the program,
- (g) definitions of all input and output variables or sets of variables,
- (h) a description of input and output file organization and the source codes., and
- (i) the person who selected or recommended the use of this computer analysis, and the date(s), place(s) and machine where the analyses were run, and the person(s) who ran them.

ANM/USPS-16. For each and every computer simulation model identified in response to ANM/USPS-5, please also provide:

- (a) information that compares the simulation model output results to the actual phenomena being modeled, using data other than the those from which the model was developed, and

- (b) a detailed statement concerning the limitations of each computer simulation model including (i) model design assumptions, the range of data input utilized in model design, and (iii) information on the tests and validation procedures and results.

Respectfully submitted,



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November 3, 1997

### **CERTIFICATE OF SERVICE**

I hereby certify that I have this day served the foregoing document on all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.



November 3, 1997